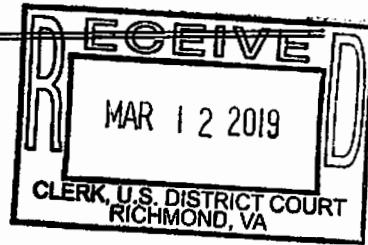


## UNITED STATES DISTRICT COURT

for the  
District of

Case No.

3:19 CV 1162

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

 Yes  NoRANDY T. THOMAS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Rehersburg Utility (Wes Water Dept.)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

RANDY T. THOMAS  
417 BURNE ST.  
Rehersburg  
VIRGINIA 23803  
804-919-1556  
ONE3BEESEEALL@GMAIL.COM

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Peterson No. 1

3-72-19

Petersburg Utility Lines Water Dept

Senior City Attorney Anthony Williams

City Attorney

804-733-2321

35 City Hall North University

Petersburg,  
Virginia, 23803.

## Defendant No. 1

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Steve Shanson

Supervisor

424 Saint Andrew St.

Petersburg,

Virginia, 23803

804-733-2404

—

## Defendant No. 2

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Kimberly Robertson

Dept. of Human Resources.

103 West 1st St.

Petersburg,

Virginia, 23803

804-733-2324.

## Defendant No. 3

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Mrs. Jamison (Retire).

Head of the Risk Dept.

103 West 1st St.

Petersburg,

Virginia, 23803.

804-733-2324.

## Defendant No. 4

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Anthony Williams

Petersburg City Attorney

35 City Hall North Union St.

Petersburg,

Virginia, 23803

Defendant No. 6

3-12-19a.

Name - Jim Reed

Job Title - In the Fire Dept

Street Address - 125 N. Union Street.

City or County - Petersburg,

State and Zip Code - Virginia, 23803.

Telephone Number -

E-mail -

Defendant No. 6 7

Name - Sgt. Hall

Job Title - on the Police Force.

Street Address - 37 E. Main Street

City or County - Petersburg,

State and Zip Code - Virginia, 23803.

Telephone Number

E-mail -

Desmond No. 7

3-12-19

Petersburg City Water Dept,

Serves as the City Attorney

Anthony Williams

804-733-2324

35 City Hall North Union St,

Petersburg,

Virginia, 23803.

Note:

3-12-19.

The two people here  
Were on the Panel Board that voted  
against me, the lawyer that I had  
that my Retirement Money Paid  
for at the time Help me with my  
case bring them a law book  
to the 3 members of the Panel Board  
that it was against the law to fire  
Any person on person under  
Doctor's care w/ with the right documents  
and I had the right documents  
from F.M.L.A. am my Doctor  
But they still voted against me 2-1.

They was No City Council members  
at the Panel meeting, neither Mayor  
or the City Manager was not  
present also.

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question  Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*fired while under Doctor's care F.M.L.A.  
1-18-17 / 4-18-17 / Filed MARCH 13 2017*

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

I AM ASKING IN THE AMOUNT OF 300,000  
OR EVEN MORE BECAUSE OF ALL  
I HAVE BEEN THROUGH.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

MY CONSTITUTION RIGHTS WERE BROKEN WHEN  
I WAS FIRED FROM MY JOB OF 17 MRS. WHILE  
UNDER DOCTOR'S CARE WITH FMLA. 1-18-17 / 4-18-17  
WHICH WAS FIRED MARCH 13-2017.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I AM ASKING FOR 300,000 BECAUSE I WAS FIRED  
WHILE UNDER DOCTOR'S CARE, I HAVE A LOT OF BACK BILL'S  
HOSPITAL, CREDIT UNION, DOCTOR'S, RENT, FAMILY ETC..

III. Relief Continey 3-2-19.

I HAVE SUSTAINED INJURY  
FROM ALL THIS TO MY BACK AND I  
CAN NOT GO WHAT I USE TOO  
I JUST WANT TO GET  
JUSTICE FOR WHAT THEY DID TO  
ME AS A PERSON.

lincerely,  
Sandy B Thomas

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-12-19.

Signature of Plaintiff

Brandi B Thomas

Printed Name of Plaintiff

Brandi B Thomas

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Street Address

\_\_\_\_\_

State and Zip Code

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address

\_\_\_\_\_